

UNITED STATES OF AMERICA, : Civil No. 1:25CV399  
Plaintiff, :  
 :  
 :  
v. :  
 :  
 :  
242,406.102 USDT in funds from Tether Ltd. :  
virtual currency address ending in F544, :  
 :  
 :  
235,680.00 USDT in funds from Tether Ltd. :  
virtual currency address ending in 5ad0, :  
 :  
 :  
223,743.002 USDT in funds from Tether Ltd. :  
virtual currency address ending in 48D4, :  
 :  
 :  
and :  
 :  
 :  
220,000.00 USDT in funds from Tether Ltd. :  
virtual currency address ending in 6cfC, :  
 :  
Defendants. :

NOW COMES Plaintiff, the United States of America, by and through Randall S. Galyon, Acting United States Attorney for the Middle District of North Carolina, and applies to the Court for issuance of a Warrant for Arrest and Notice In Rem for the above-described properties, and in support of its application, the United States will show:

1. As shown by the Declaration of Elizabeth Nawalaniec, Special Agent with the Federal Bureau of Investigation (FBI), filed in support of the Verified Complaint of Forfeiture and attached thereto as Exhibit A, there is probable cause to believe that the defendant properties were involved in transactions or attempted transactions in violation

of Title 18, United States Code, Section Sections 1956 or 1957, or are traceable to such property, and are therefore subject to seizure and forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(A).

2. As shown by Exhibit A, there is also probable cause to believe that the defendant properties constitute or were derived from proceeds traceable to an offense constituting specified unlawful activity as defined in Title 18, United States Code, Section 1956, or a conspiracy to commit such offense, specifically violations of Title 18, United States Code, Section 1343 (wire fraud) and/or Title 18, United States Code, Section 1349 (conspiracy to commit wire fraud), and are therefore subject to seizure and forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C).

3. The United States has filed a Verified Complaint of Forfeiture In Rem seeking forfeiture of the defendant properties pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and (C).

4. The United States District Court has the authority to issue this Warrant for Arrest of the defendant properties pursuant to Rule G of the Supplemental Rules for Certain Admiralty or Maritime and Asset Forfeiture Claims, and 21 U.S.C. § 881(b).

WHEREFORE, the United States of America prays that due process be issued to enforce the forfeiture and to give notice to the interested parties to appear and show cause why forfeiture should not be decreed.

This the 20<sup>th</sup> day of May, 2025.

Respectfully submitted,

RANDALL S. GALYON  
Acting United States Attorney

/s/ Lynne P. Klauer  
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